



March 3, 2022

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Via ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: The Pythian Group Inc. v. Travelclick Inc.; Index No. 21-cv-10012

Dear Judge Gardephe:

Our office represents plaintiff The Pythian Group Inc. in the above referenced matter. We write jointly with Defendant's counsel pursuant to Your Honor's Individual Rules of Practice in Civil Cases, Rule I.E, to respectfully request an adjournment of the initial pretrial conference presently scheduled to take place on March 10, 2022 (DE 5).

The parties seek a sixty (60) day adjournment of the initial pretrial conference to any date in early May that is convenient for the Court. The parties propose May 5, 2022 or May 12, 2022 for the hearing date.

The reason for the requested adjournment is that the parties are working to schedule a private mediation, to be held in mid- to late-April, in the hopes that an amicable resolution of the case can be reached without the need to incur further discovery costs.

This is the parties' first request for an adjournment of the initial pretrial hearing, and the requested extension will not impact any other deadlines. Therefore, the parties respectfully request that the initial pretrial hearing be adjourned to early May, with the parties' joint letter and proposed Case Management Order due seven (7) days before the new hearing date.

We note that Defendant's counsel reviewed this letter prior to its submission to Your Honor. We thank the Court for its attention to this matter.



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Respectfully submitted,

Wilson Elser Moskowitz Edelman & Dicker LLP

/s/ Jura Zibas

Jura C. Zibas

cc: All Counsel of Record via ECF

Memo Endorsed: The conference currently scheduled for March 10, 2022 is adjourned to May 5, 2022 at 11:00 a.m. The parties' joint letter and proposed case management plan will be due on April 28, 2022.

Dated: March 3, 2022

SO ORDERED.

A handwritten signature in black ink, reading 'Paul G. Gardephe', written over a horizontal line.

Paul G. Gardephe
United States District Judge